

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARCUS ANDRE DODD

Plaintiff,

vs.

MY SISTERS' PLACE, INC.,
KAREN CHEEKS-LOMAX, individually,
THOMAS RICE, individually,
ROBERT R. GHEEWALLA, individually,
SUZANNE SEIDEN, individually,
BARBARA RAHO, individually,
EVAN J. COHEN, individually,
LINDA PURVIS, individually,
HILARY TOUHY, individually,
CHERYL GREENBERG, individually,
PETER CUTAIA, individually,
MARIA FAUSTINO, individually, DANIA
JONES-BROWN individually, and
CHRISTINA DEBONIS, individually.

Defendants.

ANSWER
Case No. 1:21-CV-10987 (VLB)

**PLAINTIFF'S ANSWER TO DEFENDANT MY SISTERS' PLACE INC.'S
COUNTERCLAIMS¹**

AS TO "RELEVANT BACKGROUND"

1. Plaintiff admits the allegation[s] set forth in paragraph 245 of Defendant's Counterclaims.
2. Plaintiff admits the allegation[s] set forth in paragraph 246 of Defendant's Counterclaims.

3. Plaintiff admits the allegation[s] set forth in paragraph 247 of Defendant's Counterclaims.
4. Plaintiff admits the allegation[s] set forth in paragraph 248 of Defendant's Counterclaims.
5. Plaintiff admits the allegation[s] set forth in paragraph 249 of Defendant's Counterclaims.
6. Plaintiff denies the allegations set forth in paragraph 250 of Defendant's Counterclaims.
7. Plaintiff denies the allegations set forth in paragraph 251 of Defendant's Counterclaims.
8. Plaintiff denies the allegations set forth in paragraph 252 of Defendant's Counterclaims.
9. Plaintiff denies the allegations set forth in paragraph 253 of Defendant's Counterclaims.
10. Plaintiff denies the allegations set forth in paragraph 254 of Defendant's Counterclaims.
11. Plaintiff denies the allegations set forth in paragraph 255 of Defendant's Counterclaims.

AS TO "PLAINTIFF'S MISAPPROPRIATION OF MSP'S FUNDS"

12. Plaintiff denies the allegations set forth in paragraph 256 of Defendant's Counterclaims.
13. Plaintiff denies the allegations set forth in paragraph 257 of Defendant's Counterclaims.
14. Plaintiff denies the allegations set forth in paragraph 258 of Defendant's Counterclaims.
15. Plaintiff denies the allegations set forth in paragraph 259 of Defendant's Counterclaims.
16. Plaintiff denies the allegations set forth in paragraph 260 of Defendant's Counterclaims.
17. Plaintiff denies the allegations set forth in paragraph 261 of Defendant's Counterclaims.
18. Plaintiff denies the allegations set forth in paragraph 262 of Defendant's Counterclaims.
19. Plaintiff denies the allegations set forth in paragraph 263 of Defendant's Counterclaims.

20. Plaintiff denies the allegations set forth in paragraph 264 of Defendant's Counterclaims.
21. Plaintiff denies the allegations set forth in paragraph 265 of Defendant's Counterclaims.
22. Plaintiff denies the allegations set forth in paragraph 266 of Defendant's Counterclaims.
23. Plaintiff denies the allegations set forth in paragraph 267 of Defendant's Counterclaims.
24. Plaintiff denies the allegations set forth in paragraph 268 of Defendant's Counterclaims.
25. Plaintiff lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 269 of Defendant's Counterclaims.
26. Plaintiff lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 270 of Defendant's Counterclaims.
27. Plaintiff lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 271 of Defendant's Counterclaims.
28. Plaintiff lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 272 of Defendant's Counterclaims.
29. Plaintiff lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 273 of Defendant's Counterclaims.
30. Plaintiff denies the allegations set forth in paragraph 274 of Defendant's Counterclaims.
31. Plaintiff denies the allegations set forth in paragraph 275 of Defendant's Counterclaims.
32. Plaintiff denies the allegation[s] in paragraph 276 of Defendant's Counterclaims except admits that Plaintiff stated that he had updated his resume and LinkedIn profile for a New York State Office of Victim's Services (OVS) Conference.
33. Plaintiff denies the allegations set forth in paragraph 277 of Defendant's Counterclaims.
34. Plaintiff denies the allegations set forth in paragraph 278 of Defendant's Counterclaims.
35. Plaintiff denies the allegations set forth in paragraph 279 of Defendant's Counterclaims.

36. Plaintiff denies the allegations set forth in paragraph 280 of Defendant's Counterclaims.

37. Plaintiff admits the allegation[s] set forth in paragraph 281 of Defendant's Counterclaims.

38. Plaintiff denies the allegations set forth in paragraph 282 of Defendant's Counterclaims.

AS TO THE FIRST CAUSE OF ACTION AGAINST PLAINTIFF – CONVERSION

39. Plaintiff repeats and realleges as if fully set forth herein its responses to the allegations in paragraphs 245 to 283 of the complaint.

40. Plaintiff denies the allegations set forth in paragraph 283 of Defendant's Counterclaims.

41. Plaintiff denies the allegations set forth in paragraph 284 of Defendant's Counterclaims.

42. Plaintiff denies the allegations set forth in paragraph 285 of Defendant's Counterclaims.

43. Plaintiff denies the allegations set forth in paragraph 286 of Defendant's Counterclaims.

44. Plaintiff denies the allegations set forth in paragraph 287 of Defendant's Counterclaims.

45. Plaintiff denies the allegations set forth in paragraph 288 of Defendant's Counterclaims.

46. Plaintiff denies the allegations set forth in paragraph 289 of Defendant's Counterclaims.

47. Plaintiff denies the allegations set forth in paragraph 290 of Defendant's Counterclaims.

**AS TO THE SECOND CAUSE OF ACTION AGAINST PLAINTIFF – BREACH OF
THE DUTY OF LOYALTY**

48. Plaintiff repeats and realleges as if fully set forth herein its responses to the allegations in paragraphs 245 to 291 of the complaint.

49. Plaintiff denies the allegations set forth in paragraph 292 of Defendant's Counterclaims.

50. Plaintiff denies the allegations set forth in paragraph 293 of Defendant's Counterclaims.

51. Plaintiff denies the allegations set forth in paragraph 294 of Defendant's Counterclaims.

52. Plaintiff denies the allegations set forth in paragraph 295 of Defendant's Counterclaims.

53. Plaintiff denies the allegations set forth in paragraph 296 of Defendant's Counterclaims.

54. Plaintiff denies the allegations set forth in paragraph 297 of Defendant's Counterclaims.

55. Plaintiff denies the allegations set forth in paragraph 298 of Defendant's Counterclaims.

56. Plaintiff denies the allegations set forth in paragraph 299 of Defendant's Counterclaims.

57. Plaintiff denies the allegations set forth in paragraph 300 of Defendant's Counterclaims.

58. Plaintiff denies the allegations set forth in paragraph 301 of Defendant's Counterclaims.

59. Plaintiff denies the allegations set forth in paragraph 302 of Defendant's Counterclaims.

60. Plaintiff denies the allegations set forth in paragraph 303 of Defendant's Counterclaims.

WHEREFORE defendant asks this Court to dismiss the complaint and enter judgment in favor of Plaintiff.

Dated: July 15, 2022

Signed:

/s Marcus Andre Dodd;

Marcus Andre Dodd
4646 North Beacon Street, #102
Chicago, IL 60640
312-560-9880